

CalTrans District 4 Comments on MRP, rec'd 2/29/08

Thank you for the opportunity to comment on the Draft Municipal Regional Permit (MRP) that is intended to replace each municipal stormwater discharger's existing National Pollutant Discharge Elimination System stormwater permit. The Draft MRP includes references to "highways" or "highway project" in various sections. The MRP should define these terms to clarify that:

1. The California Department of Transportation (Caltrans) is responsible for the design, construction, management, and maintenance of the State highway system, including freeways, bridges, tunnels, Caltrans' facilities, and related properties. Caltrans' discharges consist of storm water and non-storm water discharges from State owned right-of-way.
2. Caltrans is regulated under a NPDES permit (ORDER NO. 99 - 06 – DWQ, NPDES NO. CAS000003) for storm water discharges from its highways, properties, facilities, and activities throughout the State of California.
3. All references to "highways" or "highway projects" do not include Caltrans highways, properties, facilities within the SF Bay RWQCB's jurisdiction.